

# EXHIBIT A

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----	X	
LIANG WANG,	:	
	:	Case No.
Plaintiff,	:	1:24-cv-03356 (AS)
	:	
vs.	:	[rel. 1:24-cv-03348 (AS)]
	:	
THE PHILHARMONIC-SYMPHONY SOCIETY	:	
OF NEW YORK, INC. AND ASSOCIATED	:	
MUSICIANS OF GREATER NEW YORK, LOCAL	:	
802, AMERICAN FEDERATION OF MUSICIANS,	:	
	:	
Defendants.	:	
-----	X	

**PLAINTIFF'S CHART IDENTIFYING THE PARAGRAPHS OF HIS AMENDED  
COMPLAINT IN WHICH THE ELEMENTS OF HIS CLAIMS AGAINST THE  
PHILHARMONIC ARE PLAUSIBLY ALLEGED**

This chart identifies the paragraphs of the Amended Complaint in which Plaintiff plausibly alleges the elements of his claims against the Philharmonic that it alleges to have not been plausibly pled. See Ex. Exhibit A to the Declaration of Ashley R. Lynam (ECF #107-1).

COUNT (CLAIM)	ELEMENTS PLAUSIBLY ALLEGED	PARAGRAPH IN AMENDED COMPLAINT
<u>Count 2</u>  Hybrid 201/DFR: Breach of Collective Bargaining Agreement  (FAC ¶¶ 179–203)	1. Employer breached the collective bargaining agreement.	¶¶ 2-4, 7, 15, 16, 23, 25, 28, 34-39, 47, 48, 50, 51, 53, 54, 55, 58-60, 68, 80, 88, 89, 90, 91, 92, 93, 95, 96, 120, 121, 131, 133, 134, 160, 164, 166-170, 179-203, 208, 211, 213, 222, 230, 239, 274, 275
	2. Union violated its duty of fair representation.	¶¶ 3, 5, 7, 16, 25, 33, 34, 40, 41, 43, 44, 45, 53, 57, 61, 62, 63, 88, 97-102, 104, 107, 109-114, 116, 118-134, 155-177, 226-230, 257-262, 282, 283

Dated: July 29, 2025  
New York, New York

Respectfully submitted,

CARTER LEDYARD & MILBURN LLP  
/s/Alan S. Lewis

By:

\_\_\_\_\_  
Alan S. Lewis  
Karen E. Meara  
28 Liberty Street, 41st Floor  
New York, NY 10005  
(917) 544-2524  
[lewis@clm.com](mailto:lewis@clm.com)  
[meara@clm.com](mailto:meara@clm.com)

*Attorneys for Plaintiff Liang Wang*